



# Oregon

Kate Brown, Governor

## Department of Environmental Quality

Northwest Region Portland Office

700 NE Multnomah St., Suite 600

Portland, OR 97232

(503) 229-5263

FAX (503) 229-5471

TTY 711

September 28, 2016

Drew Gilpin  
Manager, Environment & Utilities  
Evraz Oregon Steel (EOS)  
PO Box 2760  
Portland, OR 97208

Re: Evraz Oregon Steel  
Shoreline Source Control – Completion  
Report

Dear Mr. Gilpin:

Thank you for providing the *Riverbank Source Control Measure Completion Report* (May 27, 2016). This report provides a comprehensive, well-written documentation of the shoreline source control/stabilization action completed at this site. DEQ has the following comments which should be addressed in a revised report or addendum to the report. DEQ comments on Attachment K – Long-Term Monitoring and Maintenance Plan should be addressed in a revised Plan submitted as a stand-alone document. EPA has also reviewed the report. Their comments are attached.

### Main Text – Riverbank Source Control Measure Completion Report

1. The first bullet in Section 2.3 indicates that there were three locations where PCB concentrations exceeded 100 ug/kg at a depth of 3 feet. Data presented in Figure 6 suggest there are actually seven locations where this concentration is exceeded at 3 feet. Clarification that the composite samples collected during the removal action were given precedence over historical discrete data in determining where monitoring stakes were required should be provided and it would be helpful if pre- and post-excavation samples could be distinguished in Figure 6. Note also that the footnote on this table for starred (\*) samples indicates that samples NADU-1 and UBDU 1 - 6 reflect 3-point composites but does not indicate that NAPE 1 – 3 and UBPE 1 – 3 reflect 4-point composites. The marker stake locations should be shown in Figure 6. Text in Section 2.3 should also acknowledge the presence of PCBs at concentrations greater than 100 ug/kg north of the main project area and discuss the basis for utilizing a different approach in this area.
2. Section 3.1.3 indicates that DEQ approved placement of upper beach and berm soil in the upland locations specified in Figure 9 of the main report and Figure 5 of Attachment C. Please clarify the subsequent changes made to disposition of beach soil discussed in DEQ's May 26, 2015 letter (included in Attachment C).

3. References to as-built drawings in Section 3.3.2 and 3.6 appear to be incorrect.
4. Section 3.5.2 refers to Attachment I for characterization of material placed in the mold basement. The correct reference appears to be Attachment K, Table 5.
5. The description of the beach excavation should clarify that the original intent was to excavate beach material with PCB concentrations exceeding 670 ppb to a depth of 5 feet below the surface. The excavation depth was designed based on existing data but post excavation data collected during implementation identified two areas where PCB concentrations at three feet below the surface exceeded this value. Because these results were not available before those areas were backfilled additional excavation could not be conducted and the locations were identified with stakes to monitor erosion.
6. The reference to Table 3 in the 4<sup>th</sup> paragraph of Section 4.3 should be Table 4. A footnote should be added to Table 4 explaining why there are locations at 3 feet below the surface that exceed 670 ppb PCBs (see above comment).

#### Monitoring and Maintenance Plan – Attachment K

1. The introduction should document all contaminants of concern that are addressed by the control measures (i.e., metals in addition to PCBs) and associated concentration ranges.
2. The introduction references the Easement and Equitable Servitude (EES) for the shoreline area. A draft of the EES should be provided to DEQ for review prior to filing.
3. The monitoring schedule in Section 2.1 and summary presented in Table 1 are somewhat inconsistent. Annual inspections should be conducted in perpetuity; however, a reduced reporting frequency can be considered based on performance documented during the first 5 years.
4. The plan should indicate that documentation of all inspections will be provided to DEQ (at least for the first five years), not just submitted to a department in EOS as suggested in Sections 2.2, 2.5, and 4.1. DEQ should also be notified immediately following any observations of significant damage (slope failure or exposed contamination) and associated repair plans/actions provided for review.
5. The last paragraph of Section 2.3 is somewhat confusing. The preceding paragraph applies to three locations where total PCB concentrations exceed 0.10 mg/kg at a depth of 3 feet below post construction grade. The third paragraph would then seem to apply to the remaining areas of the beach; however, it appears to refer to specific monitoring locations. **Any** areas of excessive scour on the beach should be noted and evaluated for repair. It would also be helpful to include an overview figure with shading, or other delineation, of the areas covered in more detail in the subsequent figures.

6. Section 2.4 should better distinguish the purpose of the 10 photograph points and the 4 additional photo locations.
7. Section 3.1 indicates that vegetation monitoring will initially occur annually. Consideration should be given to conducting semi-annual monitoring (at a minimum a visual assessment of conditions and photographs) which could promote timely re-planting in case of die-off until vegetation has a chance to establish, and timely removal of invasive species.
8. Reference to Section 2.3 in the third paragraph of Section 3.2.1 should be to Section 3.3 – Performance Standards.
9. The last paragraph of Section 3.2.1 is unclear as to what steps will be taken should invasive species appear to be problematic.
10. Section 3.6 suggests that if planting areas do not meet performance objectives, the response measure may consist of applying some or all of the 8.1 Discounted Service Acre-Year net positive credits created by the project to the shortfall. Based on input from NOAA Fisheries, this is not an acceptable contingency measure and should not be included as part of the Contingency Plan.
11. The first paragraph of Section 4.1 should indicate the basis for the upland surface and subsurface soil management screening criteria, note that criteria were established for metals as well as PCBs, and indicate that the criteria are presented at the top of Tables 4 and 5.

If you have any questions, please contact me at 503-229-6148.

Sincerely,



Jennifer Sutter, Project Manager  
Northwest Region Cleanup and Tanks Section

Attachment: EPA Comments

cc w/attachment: ECSI # 141 File  
Linda Baker, Integral Consulting  
Craig Heimbucher, Integral Consulting  
Sean Sheldrake, EPA Region 10  
Eva DeMaria, EPA Region 10  
Matt McClincy, Cleanup/NWR-DEQ  
Erin McDonnell, Cleanup/NWR-DEQ